



UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
CF/AD5  
100 F STREET, NE  
WASHINGTON, D.C. 20549-3561

DIVISION OF  
CORPORATION FINANCE

April 17, 2009

Via Mail and Fax

Marsha C. Williams  
Senior Vice President and Chief Financial Officer  
Orbitz Worldwide, Inc.  
500 W. Madison Street, Suite 1000  
Chicago, Ill 60661

**RE: Orbitz Worldwide, Inc.  
Form 10-K for the Year Ended December 31, 2007  
File Number: 001-33599**

Dear Ms. Williams:

We have completed our review of your Form 10-K and related filings, and at this time do not have further comments.

Sincerely,

Lyn Shenk  
Branch Chief